



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

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EPA Region 5 Records Ctr.



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Mr. Richard C. Karl, Director  
Superfund Division  
USEPA Region 5  
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Chicago, IL 60604-3507

Subject: Concurrence with the Proposed Plan for Ashland Northern States Power Lakefront Superfund Site, Ashland Wisconsin

Dear Mr. Karl:

I am sending you this letter to document that the Wisconsin Department of Natural Resources has reviewed the Proposed Plan for the Ashland site. This plan includes the remediation of soils, groundwater and sediments contaminated with manufactured gas plant wastes including poly aromatic hydrocarbons (PAHs) and Volatile Organic Compounds (VOCs).

In the proposed plan, EPA recommended the following scenario to address contamination at the site: Cleanup soil at Kreher Park and the Upper Bluff/Filled Ravine through limited soil removal with either thermal treatment or off-site disposal. Cleanup of shallow ground water at the Upper Bluff/Filled Ravine and Kreher Park would be achieved through the use of engineered surface and vertical barriers with enhanced ground water extraction and partial capping. Ground water cleanup in the Copper Falls aquifer would be achieved through enhanced ground water extraction and through in-place treatment. Sediment cleanup in Chequamegon Bay would be accomplished through a combination of dry removal in the inner bay and dredging in the outer bay with thermal treatment and/or disposal of sediment and wood waste.

We understand that many of the specifics regarding these remedial actions will be clarified through the design process. The Department does, however, have some concerns regarding short term impacts of the proposed actions.

#### Minimize Air Pollutants

Controls and monitoring should be put in place to minimize the generation and transport of airborne contaminants and dust. Manufactured Gas Plant air monitoring guidance should be followed including the expectation that the Potentially Responsible Parties need to have clear communication with the effected neighbors. Air quality standards identified as Applicable or Relevant and Appropriate Requirements (ARARs) must not be exceeded outside of the exclusion zone (work/handling) or during the transport of contaminated media.

#### Minimize Impacts to Water Resources

Prior to any dredging activities a semi-permanent barrier needs to be constructed at the contaminated sediment boundary. Due to the significant Non-Aqueous Phase Liquid (NAPL) associated with the sediments slicks and dissolved phase surface water contamination will be un-avoidable. Surface water quality standards as identified

as ARARs must not be exceeded outside of the containment area including releases of NAPL sheens and/or turbidity.

#### Optimize Future Use of the Site

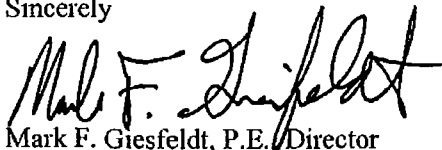
The remedial design should integrate the City of Ashland Waterfront Development Plan for the future development of their lakeshore into the cleanup strategy. The site sits in the middle of that area. Any remediation carried out should be consistent with the future uses outlined in that plan.

#### Sediments

The Department supports the proposed plan's actions for remediation of the sediment at the site. We believe that the dry dredging approach is the most effective technology for removal of the contaminated sediment, wood waste, and free product. In addition we believe that dry dredging is the most effective approach to meet the Preliminary Remediation Goals (PRGs) and performance standards. The Department continues to be concerned over the potential release or suspension of free product into the water column during dredging and the potential to impact clean sediment. The free product in the wood wastes and sediments needs to be considered a source. Northern States Power has proposed to test an alternative technology, wet dredging, for removing contaminated sediment at the site. At this time we are receptive to the proposal but remain concerned with the viability of the approach and the potential release of contaminants. However it remains Northern States Power responsibility to demonstrate and document the effectiveness of wet dredging to limit the suspension of free product into the water column and therefore the impacts to clean sediment and the ability to meet the PRGs and performance standards. If, through pre-design testing, it is apparent that PRGs and performance standards cannot be achieved or NAPL redistribution is a problem then dry excavation should be required.

We are pleased with the close working relationship between agency staff and hope to work in close consultation through the Record of Decision and design phases of the site. We appreciate your efforts thus far and look forward to working with your staff until the site is remediated. If you have any questions regarding this letter please contact John Robinson at (715) 365-8976.

Sincerely



Mark F. Giesfeldt, P.E. Director  
Bureau for Remediation and Redevelopment

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